

**FILED**

**11/5/2021 DB**

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

VAHOOMAN MIRKHAEF

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) No. **21cr685**

)

) Violation: 18 U.S.C. § 371

**Judge Mary M. Rowland**

**Magistrate Judge Young B. Kim**

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

a. Defendant VAHOOMAN MIRKHAEF operated a business known as Cub Terminal located in the Village of McCook. MIRKHAEF sought approval from the Illinois Department of Transportation (“IDOT”) for the purchase of property located adjacent to MIRKHAEF’s McCook business (the “McCook Property”).

b. State Senator A was an Illinois State Senator and the Chairman of the Senate Transportation Committee. As Chairman of the Senate Transportation Committee, State Senator A was in a position to assist with obtaining IDOT approvals for MIRKHAEF’s purchase of the McCook Property, and was in a position to influence and advise IDOT officials concerning the sale of the McCook property. The State of Illinois was a government that received in excess of \$10,000 in federal benefits during each year in 2018 and 2019.

c. Individual A was an associate of MIRKHAEF and State Senator A.

2. From no later than in or around 2018 and continuing until in or around January 2019, at McCook, in the Northern District of Illinois, Eastern Division, and elsewhere,

VAHOOMAN MIRKHAEF,

defendant herein, knowingly conspired and agreed with Individual A, State Senator A, and others to commit an offense against the United States, that is:

a. to corruptly solicit and demand, and accept and agree to accept, anything of value, namely, a cash payment for the benefit of State Senator A, intending that State Senator A, as an agent of the State of Illinois, be influenced and rewarded in connection with any business, transaction, and series of transactions of the State of Illinois involving anything of value of \$5,000 or more, namely, the use and purchase of the McCook Property, in violation of Title 18, United States Code, Section 666(a)(1)(B); and

b. to corruptly give, offer, and agree to give anything of value, namely, a cash payment, with intent to influence and reward State Senator A, as an agent of the State Illinois, in connection with any business, transaction, and series of transactions of the State of Illinois involving anything of value of \$5,000 or more, namely, the use and purchase of the McCook Property, in violation of Title 18, United States Code, Section 666(a)(2).

### **Manner and Means of the Conspiracy**

3. It was part of the conspiracy that MIRKHAEF corruptly agreed with Individual A and State Senator A that MIRKHAEF would pay money to State Senator A as a reward for State Senator A's efforts to influence and advise IDOT officials to act more expeditiously with respect to the sale of the McCook Property.

4. It was further part of the conspiracy that Individual A requested State Senator A's support in connection with MIRKHAEF's purchase of the McCook property and communicated to State Senator A that MIRKHAEF would pay State Senator A in return for his support.

5. It was further part of the conspiracy that MIRKHAEF provided State Senator A with information for State Senator A to use in attempting to influence and advise IDOT to act more expeditiously with respect to the sale of the McCook Property.

6. It was further part of the conspiracy that MIRKHAEF agreed to pay State Senator A as a reward for State Senator A's efforts to influence and advise IDOT regarding the sale of the McCook Property.

7. It was further part of the conspiracy that State Senator A used his position as a Senator to attempt to influence and advise IDOT regarding the sale of the McCook Property.

8. It was further part of the conspiracy that MIRKHAEF agreed with Individual A and State Senator A to pay State Senator A in exchange for State Senator A's efforts to influence and advise IDOT officials.

9. It was further part of the conspiracy that MIRKHAEF and his co-conspirators misrepresented, concealed, and hid, and caused to be misrepresented, concealed, and hidden, and attempted to misrepresent, conceal, and hide acts done in furtherance of the conspiracy and the purpose of those acts.

### **Overt Acts**

10. In furtherance of the conspiracy and to effect its objects and purposes, MIRKHAEF, Individual A, and State Senator A committed and caused to be committed the following overt acts, among others, in the Northern District of Illinois and elsewhere:

a. On or about June 20, 2018, MIRKHAEF forwarded to State Senator A an email string between MIRKHAEF and IDOT officials, so that State Senator A could use that information to attempt to influence and advise IDOT officials regarding the sale of the McCook Property.

b. On or about June 28, 2018, State Senator A met with IDOT officials and sought to influence and advise them regarding the sale of the McCook Property.

c. On or about August 2, 2018, MIRKHAEF agreed to pay State Senator A \$25,000.

d. On or about August 28, 2018, MIRKHAEF agreed to pay State Senator A \$25,000.

e. On or about December 17, 2018, Individual A arranged for MIRKHAEF and State Senator A to meet the following day.

f. On or about December 18, 2018, Individual A asked MIRKHAEF to pay State Senator A as a reward for State Senator A's support of MIRKHAEF's acquisition of the McCook property in October 2018.

g. In or around late December 2018, State Senator A went to MIRKHAEF's office for the purpose of confirming that MIRKHAEF would pay State Senator A.

h. On or about January 21, 2019, MIRKHAEF caused State Senator A to be paid in excess of \$15,000 in cash.

All in violation of Title 18, United States Code, Section 371.

**AMARJEET  
BHACHU**

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Signed by Amarjeet S. Bhachu  
on behalf of the  
UNITED STATES ATTORNEY